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July 7, 2022

Via ECF

Honorable Colleen McMahon

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street

New York, New York 10007-1312

RE: United States v. Tiran Branch

22 cr 82(CM)

Dear Judge McMahon,

I represent Tiran Branch in the above matter. I am writing to request that the travel restriction ordered in regard to Tiran Branch be amended to allow Tiran Branch to stay overnight for a one-week period From July 11, 2022 until July 15, 2022.

Tiran Branch has employment as a Driver Sales Representative for XPO Logistics. As such, Tiran Branch is required to drive freight loads to various locations inside and outside of New York State. Usually, no trip requires an overnight stay. Tiran Branch is on electronic monitoring through use of an electronic ankle bracelet. Tiran Branch's current travel restrictions allow travel to and from Philadelphia. However, he has always been required to return home each night after work.

Mr. Branch has been asked by his company to engage in this one week project and it will result in additional income for Mr. Branch . Mr. Branch will inform Pre-Trial Officer Barrios with the location where he will be lodged overnight by his company as soon as he is informed of the location.

I have been informed by Pre-Trial Officer Leo Barrios that he does not object to the change in travel restrictions that would permit Tiran Branch to stay in Philadelphia overnight for the week of July 11th as long as he is provided with the location of the overnight stays. Additionally, I have informed AUSA Alexander Li of the specifics of this request and I have not yet received a response from the Government in regard to their position.

For the foregoing reasons I ask that the Court permit Tiran Branch to stay overnight in Philadelphia while engaging in work related activities from July 11, 2022 through July 15, 2022, with the condition that he notify Pre-Trial Services of his overnight stay locations.

Sincerely,

Kyle B. Watters

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